

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

GARY LEE LOYER, SR. as
Personal Representative for the
Estate of GARY LOYER,
Deceased,

Plaintiff,

v.

WAYNE COUNTY MICHIGAN et
al.,

Defendants.

Case No. 21-12589
Honorable Shalina D. Kumar
Magistrate Judge Curtis Ivy, Jr.

**ORDER REQUIRING PLAINTIFF'S COUNSEL TO ATTEND ETHICS
SEMINAR**

Counsel for plaintiff, Ronnie E. Cromer, Jr. ("Cromer") filed a response brief containing multiple citations that were entirely fictitious, had different citations, and/or did not contain the quote or content attributed to them. See ECF No. 50. Cromer admitted at a hearing before the Court on March 12, 2025 that he used a generative artificial intelligence engine (AI) to draft that brief, that AI supplied the bogus case law cited, and that he did not review or cite check that case law before filing his brief.

Due to Cromer's negligent conduct in this case, the Court **ORDERS** him to attend the ethics seminar offered by the State Bar of Michigan on **April 8, 2025**, from 9:00 a.m. to 3:30 p.m. See michbar.org/tipstools. See <https://michbar.org/tipstools> for link to register.

Following his completion of that course, Cromer must submit to the Court the Confirmation of Attendance Certificate issued by the State Bar to attendees who meet the attendance requirements as detailed on the website at the address cited above.

If Cromer fails to comply with this order, the Court will refer him to the State Bar for discipline.

IT IS SO ORDERED.

Dated: March 14, 2025

s/ Shalina D. Kumar
SHALINA D. KUMAR
United States District Judge